

**CERTIFICATE OF SERVICE**

I, Mark A. Aronchick, certify that on June 9, 2020, I caused a true and correct copy of the foregoing Motion for Leave to File Memorandum of Law of the County Defendants in Support of Motion of Non-Parties Common cause Pennsylvania and League of Women Voters of Pennsylvania for Leave to Intervene, to be electronically filed and served with the Court using the Electronic Case Filing System.

/s/ Mark A. Aronchick  
Mark A. Aronchick